

Rachel Steinback, SBN 310700
Law Office of Rachel Steinback
3435 Wilshire Blvd, Suite 2910
Los Angeles, CA 90010
(t) 213-537-5370
(f) 213-232-4003
(e) steinbacklaw@gmail.com

Carol A. Sobel, SBN 84483
Monique A. Alarcon, SBN 311650
LAW OFFICE OF CAROL SOBEL
725 Arizona Avenue, Suite 300
Santa Monica, CA 90401
(t) 310-393-3055
(e) carolsobel@aol.com
(e) monique.alarcon8@gmail.com

Attorneys for Plaintiffs.

[Additional Counsel on Following Page]

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA
MARTINEZ; ISAAC ANTONIO
LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE
MATEO LEMUS CAMPOS;
MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER
ANTONIO BURGOS MEJIA; LUIS
PENA GARCIA; JULIO CESAR
BARAHONA CORNEJO, as
individuals,

Plaintiffs,

V.

THE GEO GROUP, Inc., a Florida corporation; the CITY OF ADELANTO, a municipal entity; GEO LIEUTENANT DURAN, sued in her individual capacity; GEO LIEUTENANT DIAZ, sued in her individual capacity; GEO SERGEANT CAMPOS, sued in his individual capacity; SARAH JONES, sued in her individual capacity; THE UNITED STATES OF AMERICA; and DOES 1-10, individuals,

Defendants.

Case No. 5:18-cv-01125-SP

PLAINTIFFS' PROPOSED VOIR DIRE

Pretrial Conference
Date: January 21, 2020
Time: 10:00 a.m.

Trial date: February 3, 2020
Time: 9:00 a.m.

Magistrate

Judge: Honorable Sheri Pym

1 Catherine Sweetser, SBN 271142
2 Kristina A. Harootun, SBN 308718
3 SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
4 11543 W. Olympic Boulevard
5 Los Angeles, CA 90064
(t) 310-396-0731
(f) 310-399-7040
(e) csweetser@sshhlaw.com
(e) kharootun@sshhlaw.com

7
8 Colleen Flynn, SBN 234281
9 LAW OFFICE OF COLLEEN FLYNN
3435 Wilshire Boulevard, Suite 2910
10 Los Angeles, CA 90010
(t) 213-252-9444
(f) 213-252-0091
(e) cflynn@yahoo.com

13 Matthew Strugar, SBN 232951
14 LAW OFFICE OF MATTHEW STRUGAR
15 3435 Wilshire Boulevard, Suite 2910
16 Los Angeles, CA 90010
(t) 323-696-2299
(e) matthew@matthewstrugar.com

18
19
20
21
22
23
24
25
26
27
28

1 **TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR
2 ATTORNEYS OF RECORD:**

3 PLAINTIFFS hereby submit the following proposed *voir dire* questions,
4 to be asking in addition to the standard questions and the juror questionnaire:

5

6 1. The Plaintiffs in this case came here from El Salvador and from
7 Honduras. Have you ever had a negative experience with people who have come
8 here from Central America? If so, please explain. How do you think that will affect
9 you, given that this lawsuit is brought by immigrants from Central America?

10 2. In this case, Plaintiffs came to the United States seeking asylum. Have
11 you worked with or do you know people who are asylum seekers? Have you ever
12 had a negative experience with people who have come to the United States seeking
13 asylum? If so, please explain. How do you think that will affect you, given who
14 Plaintiffs are?¹

15 3. Some people think that our immigration laws are too lenient and that
16 we should have stricter immigration laws. Can I hear from each one of you about
17 whether you agree or not?

18 4. In this case, Plaintiffs were civil detainees at a private immigration
19 detention center. Do you know the difference between civil detainees and criminal
20 detainees?

21 5. Do you believe that persons who are detained should have any
22 constitutional rights?

23 6. Do you believe that non-citizens should be protected by the rights
24 guaranteed to Americans under the United States Constitution?

25 7. Do you think non-citizens should be able to bring lawsuits in courts in
26 the United States for the violations of constitutional rights?

27

28

¹ To be given pending the Court's ruling on Defendants' Motion *in Limine* No. 2.

1 8. In this case, you will hear that Defendants Jane Diaz and Giovanni
2 Campos were private detention officers. Everything else being equal, would you be
3 more likely to believe a detention officer's testimony than the testimony of a
4 detainee?

5 9. Do you think that a detention officer is capable of testifying falsely
6 under oath to support a fellow officer?

7 10. Have you ever been a victim of a crime? If so, what was the crime?
8 Did you have a positive or negative impression of law enforcement as a result?
9 Could you set that experience aside and be fair to both sides?

10 11. Have any of your close family members or friends ever been a victim
11 of a crime? If so, what was the crime? Did you have a positive or negative
12 impression of law enforcement as a result? Could you set that experience aside and
13 be fair to both sides?

14 12. Are you or any of your family members or close friends current or
15 former detention officers, law enforcement officers, or corrections officers?

16 13. Are you or any of your family members or close friends current or
17 former service members in any division or branch of our military? If yes, what
18 agency and what type of job?

19 14. Have you ever worked in a jail, prison, or detention center? If so,
20 when, where, and in what capacity?

21 15. Have any of your family members or close friends ever worked in a
22 jail, prison, or detention center? If so, when, where, and in what capacity?

23 16. Have you ever thought about working in law enforcement?

24 17. Have you ever attended any sort of law enforcement training?

25 18. Have you ever worked for a federal, state, or local government
26 agency? If so, when, where, and in what capacity?

1 19. Have any of your family members or close friends ever worked for a
2 federal, state, or local government agency? If so, when, where, and in what
3 capacity?

4 20. Have you ever worked in the medical field? If so, please tell us about
5 that work.

6 21. Have your family members or close friends ever worked in the
7 medical field? If so, please explain your relationship to them and tell us about their
8 work.

9 22. How would you consider the testimony of a physician, doctor, or a
10 nurse as compared to the testimony of any other witness? The same? More
11 credible?

12 23. This is a lawsuit brought by Central American immigrants against a
13 private corporation called The GEO Group, Inc. and its employee detention
14 officers. Do you disagree with the idea that immigrants who believe they have
15 been treated illegally should have the right to bring a lawsuit for damages against
16 the people or corporation they claim harmed them?

17 24. Do you disagree with the idea that our society should hold detention
18 officers liable in court when they violate people's rights?

19 25. Do you disagree with the idea that detention officers or the entity they
20 work for should pay money damages when they violate people's rights?

21 26. Do you think there are too many lawsuits? If yes, why? Can you give
22 an example of a lawsuit that you think was important to bring?

23 27. Do you believe that a person should not be able to receive
24 compensation for their emotional injuries if there is no objective way to prove or
25 disprove those injuries? Why or why not?

26 28. Plaintiffs are asking for different kinds of damages in this case,
27 including damages for emotional distress. Some people have a problem with the
28

1 idea of recovering damages for emotional distress caused by someone else. Can I
2 hear from each one of you about how you feel about this concept?

3 29. The Plaintiffs have to prove the case by a preponderance of the
4 evidence. What that means is Plaintiffs will have to prove that their claims are
5 more probably true than not true. Do you believe that burden should be heavier?

6 30. What newspapers and magazines do you regularly read?

7 31. What websites or blogs do you regularly visit?

8 32. What news programs do you regularly watch or listen to?

9 33. Have you ever been involved in a political group or political activity?

10 If so, when and in what capacity?

11
12 Dated: January 16, 2020

LAW OFFICE OF RACHEL STEINBACK
LAW OFFICES OF CAROL A SOBEL
SCHONBRUN SEPLOW HARRIS
& HOFFMAN LLP

LAW OFFICE OF COLLEEN FLYNN
LAW OFFICE OF MATTHEW STRUGAR

13
14
15
16 By: /s/ Rachel Steinback
17 *Attorneys for Plaintiffs.*

18
19
20
21
22
23
24
25
26
27
28